

KEVIN G. HORBATIUK (KGH-4977)
RUSSO, KEANE & TONER, LLP
Attorneys for Defendant
CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING CO., INC.
26 Broadway - 28th Floor
New York, New York 10004
(212) 482-0001

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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**IN RE COMBINED WORLD TRADE CENTER
AND LOWER MANHATTAN DISASTER SITE
LITIGATION**
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21 MC 102 (AKH)

KRZYSZTOF ZALEWSKI and DANUTA ZALEWSKI,

**DOCKET NO:
07 CV 05330**

Plaintiffs,

-against-

**100 CHURCH, LLC, 160 WATER STREET, INC,
160 WATER STREET ASSOCIATES, 55
WATER CONDOMINIUM, 90 CHURCH STREET
LIMITED PARTNERSHIP, AIG REALTY, INC.,
ALAN KASMAN DBA KASCO, ALLBRIGHT
PARKING MANAGMENT, INC., AMBIENT
GROUP, INC., AMERICAN INTERNATIONAL
REALTY CORP., ANN TAYLOR STORES
CORPORATION, BATTERY PARK CITY
AUTHORITY, BELFOR USA GROUP, INC.,
BLACKMON-MOORING STEAMATIC CATASTOPHE,
INC., d/b/a BMS CAT, BOARD OF MANAGERS OF
THE HUDSON VIEW EAST CONDIMINIUM,
BOSTON PROPERTIES, INC., BROOKFIELD
FINANCIAL PROPERTIES, INC.,
BROOKFIELD FINANCIAL PROPERTIES, L.C.,
BROOKFIELD PARTNERS, L.P., BROOKFIELD
PROPERTIES CORPORATION, BROOKFIELD
PROPERTIES HOLDINGS, INC., CENTRAL
PARKING SYSTEMS OF NEW YORK, CUNNINGHAM
DUCT CLEANING CO., EDISON PARKING
MANAGEMENT, LP., ENVIROTECH CLEAN
AIR, INC., G.L.O MANAGEMENT, INC., GPS**

**NOTICE OF
ADOPTION OF
ANSWER TO MASTER
COMPLAINT**

ENVIRONMENTAL CONSULTANTS, INC.,
HILLMAN ENVIRONMENTAL GROUP, LLC
HUDSON VIEW EAST CONDOMINIUM, HUDSON
VIEW EAST CONDOMINIUM, HUDSON VIEW
TOWERS ASSOCIATES, INDOOR AIR PROFESSIONALS,
INC., INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,
KASKO RESTORATION SERVICES CO., LAW
ENGINEERING, P.C., MERILL LYNCH & CO.,
MERILL LYNCH & CO., INC., NEW WATER
STREET CORP., NOMURA HOLDING AMERICA,
INC., NOMURA SECURITIES INTERNATIONAL, INC.,
ONE WALL STREET HOLDINGS, LLC,
R Y MANAGEMENT CO., INC., ROYAL AND SUNALLIANCE
INSURANCE GROUP, PLC., STRUCTURE TONE (UK)
INC., STRUCTURE TONE GLOBAL SERVICES, INC.,
THE BANK OF NEW YORK COMPANY, INC.,
TOSCORP., INC., TRC ENGINEERS, INC., WESTON
SOLUTIONS, INC, WFP TOWER B CO., G.P.,
CORP., WFP TOWER B HOLDING CO., L.P., WFP TOWER
B CO., L.P., WFPT TOWER D CO., G.P., CORP., WFP
TOWER D HOLDING CO., I. L.P., WFP TOWER D
HOLDING I. G.P., CORP., WFP TOWER D CO., L.P.,
and ZAR REALTY MANAGEMENT CORP., et al.

Defendants.

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PLEASE TAKE NOTICE, that defendant CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC. ("CUNNINGHAM"), by its attorneys, RUSSO, KEANE & TONER, LLP, as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off-Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102(AKH).

WHEREFORE, the defendant, CUNNINGHAM demands judgment dismissing the above captioned caption action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
January 14, 2008

Kevin G. Horbatiuk
Kevin G. Horbatiuk (KGH4977)
Attorneys for Defendant
CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING CO.,
INC.
RUSSO, KEANE & TONER, LLP
26 Broadway, 28th Floor
New York, New York 10004
(212) 482-0001
RKT File No. 824.078

TO: CHRISTOPHER R. LaPOLA, ESQ.,
WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Attorney for Plaintiffs
KRZYSZTOF ZALEWSKI and DANUTA ZALEWSKI
115 Broadway 12th Floor
New York, New York 10006
(212) 267-3700

CERTIFICATION OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 14th day of January, 2008.

CHRISTOPHER R. LaPOLA, ESQ.,
WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Attorney for Plaintiffs
KRZYSZTOF ZALEWSKI and DANUTA ZALEWSKI
115 Broadway 12th Floor
New York, New York 10006

A handwritten signature in black ink, reading "Kevin G. Horbatiuk". The signature is written in a cursive style with a horizontal line underneath.

KEVIN G. HORBATIUK